

MEMO ENDORSED

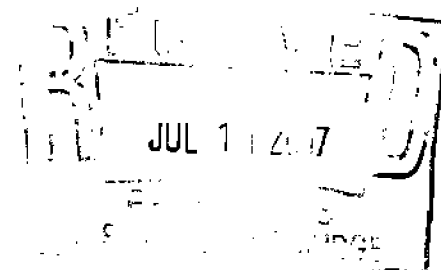


Robert T. Haefele
Licensed in SC, NJ & PA
DIRECT DIAL 843.216.9184
DIRECT FAX 843.216.9450
RHaefele@motleyrice.com

July 10, 2007

Via Federal Express

Honorable Frank Maas
United States Magistrate Judge
United States District Court
Southern District of New York
500 Pearl Street, Room 740
New York, New York 10007-1312



Re: *In re Terrorist Attacks on September 11, 2001*
03 MDL 1570 (GBD)(FM)

Dear Judge Maas:

In an endeavor to reduce the disputes among the parties, we are writing on behalf of the plaintiffs in the above-referenced matter to clarify one issue regarding the Order Your Honor entered on July 6, 2007. In paragraph 2a, Your Honor directed defendant SBG to produce documents concerning: "Osama bin Laden's separation from SBG, including, but not limited to, documents relating to the establishment of a trust."

As a preliminary matter, we understand that the court did not intend to make a finding that Osama bin Laden has, in fact, been separated from SBG; but rather, the court intended to direct SBG to produce all documents that concerned that contention by SBG.

I agree

Moreover, inasmuch as Your Honor made reference during the hearing to a number of other documents that fall into the category highlighted in Paragraph 2a, we wish to confirm that - as part of the "including, but not limited to" phrase - Your Honor intended for SBG to produce the other documents referenced as well. More specifically, during the discussion of the issue of Osama bin Laden's alleged separation from SBG, Your Honor indicated that, in addition to documents concerning the establishment of a trust, SBG was also expected to produce documents regarding the assignment of Osama bin Laden's interests, documents regarding the terms of the trust and what happened to the trust, documents regarding what was submitted to the Sharia court and the Sharia court's determination, as well as any documents that address the purpose for distancing SBG from

See over

www.motleyrice.com

Motley Rice LLC
Attorneys at Law



MT. PLEASANT

28 BRIDGESIDE BLVD.
P.O. BOX 1792
MT. PLEASANT, SC 29465
843-216-9000
843-216-9450 FAX

BARNWELL

1750 JACKSON ST.
P.O. BOX 365
BARNWELL, SC 29812
803-224-8800
803-259-7048 FAX

PROVIDENCE

321 SOUTH MAIN ST.
P.O. BOX 6067
PROVIDENCE, RI 02940
401-457-7700
401-457-7708 FAX

HARTFORD

ONE CORPORATE CENTER
20 CHURCH ST., 17TH FLOOR
HARTFORD, CT 06103
860-882-1681
860-882-1682 FAX

ATLANTA

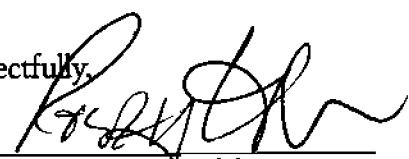
600 WEST PEACHTREE ST
SUITE 800
ATLANTA, GEORGIA 30308
404-201-6900
404-201-6959 FAX

Honorable Frank Maas
Re: 03 MDL 1570 (GBD) (FM)
July 10, 2007
Page 2 of 3

Osama bin Laden. (See attached excerpts from Transcript of Hearing at page 42, line 6 to page 44, line 16.)

Respectfully,

By:


Robert T. Haefele

cc: James Gauch, Esq., Counsel for SBG
Via Federal Express

Plaintiffs Executive Committee

Attachments

I clearly intended to include in the scope of my order the additional documents recited in the transcript of the conference. Additionally, with respect to the temporal scope of the required production, an issue which is the subject of additional letters dated 7/16 and 7/20/07, I see no reason why all of the trust records for a lengthy period should be produced. On the other hand, any records which reflect a change in the structure or trustees of the trust or its beneficiaries should be turned over regardless of date. The intent of this directive is not to require that records of changes in the assets of the trust be disclosed, unless there were transfers to Osama bin Laden (which I believe SBG has previously represented is not the case).

FMaas, USMS, 7/26/07